

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

L.G. PHILLIPS LCD CO., LTD.,

Plaintiff,

v.

TATUNG COMPANY; TATUNG
COMPANY OF AMERICA, INC.; AND
VIEWSONIC CORPORATION,

Defendants

C. A. No. 04-343-JJF

**DEFENDANTS TATUNG COMPANY AND TATUNG COMPANY OF
AMERICA'S CERTIFICATION OF COUNSEL PURSUANT TO LOCAL RULE
7.1.1 REGARDING MOTION FOR PROTECTIVE ORDER LIMITING SCOPE
OF DEPOSITIONS TO ACCUSED PRODUCTS**

I hereby certify that counsel for Defendants Tatung Company and Tatung Company of America (jointly, "Tatung") attempted in good faith to resolve the issues presented in Tatung's June 5, 2007 motion for protective order limiting the scope of depositions and Rule 30(b)(6) topics noticed by LG Philips LCD Co., Ltd. ("LPL") to the accused products identified in LPL's interrogatory responses.

Throughout the course of discovery, the parties have had multiple discussions regarding limiting discovery to accused products. These discussions have arisen in the context of written discovery, third party discovery, as well as the Rule 30(b)(6) depositions noticed by LPL. Tatung has attempted on multiple occasions to meet and confer with LPL regarding these issues.


As an additional good faith attempt to meet and confer, counsel for Tatung sent a letter to counsel for LPL on June 4, 2007 addressing the subject of the motion for

protective order. (*See* Exh. A.) Tatung asked LPL to confirm that the depositions on the assembly-related topics will be limited to the accused products identified by LPL. Counsel for LPL indicated that it will not agree to limit the depositions to accused products. (*See* Exh. B.)

Despite Tatung's good faith efforts, the parties have not been able to resolve their disputes, and Tatung therefore submitted its motion on June 5, 2007 for consideration by the Special Master.

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Dated: June 5, 2007


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**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

CERTIFICATE OF SERVICE

I hereby certify that on June 5, 2007 I caused to be served by electronic mail the foregoing document and electronically filed the same with the Clerk of Court using CM/ECF which will send notification of such filing(s) to the following:

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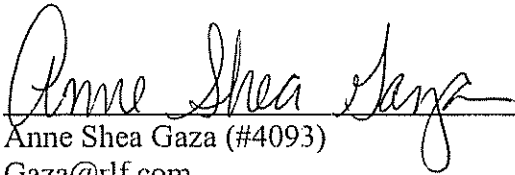
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I hereby certify that on June 5, 2007 I caused to be sent the foregoing document by electronic mail to the following non-registered participants:

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